

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL CRISSWELL, individually and on)	
behalf of a class of similarly situated individuals,)	
)	No. 08 CV 01578
Plaintiff,)	
)	Judge Milton I. Shadur
vs.)	Magistrate Judge Sidney I. Schenkier
)	
MYSPLACE, INC., a Delaware corporation,)	
)	
Defendant.)	
)	

**AGREED MOTION FOR AN EXTENSION OF TIME FOR MYSPACE, INC.
TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendant MySpace, Inc. (“MySpace”), by and through its undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b), hereby respectfully requests that the Court extend the time to answer or otherwise respond to the Complaint until 21 days after a decision by the Court on any motion to remand or 21 days after Plaintiff’s counsel provides written notice to MySpace counsel of Plaintiff’s intent not to challenge federal jurisdiction. Plaintiff’s counsel has advised that they have no objection to this Motion. In further support of its Motion, MySpace states:

1. On February 15, 2008, plaintiff Michael Crisswell commenced a putative class action against MySpace in the Circuit Court of Cook County, Illinois, Chancery Division, Case No. 08 CH 05929 (the “State Court Action”).

2. Having removed the State Court Action to the Court on March 18, 2008, MySpace, pursuant to Federal Rule of Civil Procedure 81, is required to file its answer or responsive motion on or before March 25, 2008.

3. Plaintiff’s counsel has indicated that Plaintiff may challenge the jurisdiction of the Court to hear this action with a motion to remand, and the Parties agree that an answer or

other responsive pleading need not be filed until the issue of jurisdiction is resolved.

4. On March 13, 2008, the Parties agreed to this extension, and on March 18, 2008, Plaintiff's advised they had no objection to this Motion.

5. MySpace respectfully requests that the Court extend MySpace's time to answer or otherwise respond to the Complaint until (i) 21 days after a decision by the Court on any motion to remand or (ii) 21 days after Plaintiff's counsel provides written notice to MySpace counsel of Plaintiff's intent not to challenge federal jurisdiction.

6. This Motion has been filed in good faith and is not interposed for purposes of delay, and the requested extension will not prejudice Plaintiff. MySpace has made no previous requests for an extension.

WHEREFORE, MySpace respectfully requests that the Court enter an order granting the requested extension, and ordering such further relief as the Court deems necessary and just.

Dated: March 19, 2008

Respectfully submitted,
MYSPACE, INC.

By: /s/ David R. Geerdes
One of its attorneys

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CERTIFICATE OF SERVICE

I am an attorney and hereby certify that on March 19, 2008, I caused true copies of the foregoing AGREED MOTION FOR AN EXTENSION OF TIME FOR MYSPACE, INC. TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT to be served by messenger upon the following counsel for Plaintiff:

Myles McGuire
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/s/ David R. Geerdes
David R. Geerdes
Attorney for defendant MySpace, Inc.